

Randall L. Russell

30 June 2006

Subject: Response/comments on "FTC 16 CFR Part 437 Business Opportunity Rule"

Sirs,

Your proposed rule brings up many issues with business opportunities being presented in America today. It would be beneficial to stop the American public from being scammed into illegal and immoral "things" that are being presented as business opportunities. In times like they are today, many Americans are looking for something to help them make ends meet financially. They are vulnerable to such scams more than in times past. Your intentions are well put by making this proposal.

The business that I am a part of is Quixtar. I have been with the company now for over 30 months. I have seen the good and the bad involved with this company. I have experienced many things that cause me concern over your proposal. What must be protected though is the right and need for legitimate opportunities to prosper during the process of protecting the general public. Some of the ideas touched on by your proposal may not allow good companies to help those Americans that want and need our help. I am sure it is not your intention to slow Americans ability to prosper and help each other to prosper through good sound business practices. I would like to give you my opinion of what rules you are including that may not be of the best interest of the general public.

I have set through presentations that made a hard sell at the end to get you to "buy something then or lose it." Those are not a good idea and give the whole industry a bad name. You are proposing a 7 day waiting period after receiving disclosures before they could be registered. I believe that a 7 day waiting period would cause more harm than good. No rule of this kind would be hard to get around for those wishing to scam someone. It just hurts the people that are trying to do business in a proper manner. As with other laws of this nature (waiting periods), it will be lengthened as it is realized people have found ways around it. That does no-one any good. We go one step further than your proposal already. We provide a way for them to receive all their money back during the first year with the company. Maybe it would be a good idea to make other companies provide the same. That would solve the same problem with a solution much harder to get around.

Other proposals I would like to address together as one are concerning the lists of references and of the documentation of personal financial gain. It is clear what the intent of this proposal is to address. I totally agree that references and proof of financial gain should be provided to people in business together. What concerns me is that many people that I discuss our business with, and give a presentation to, do not get in business with us or do not last. I would not think it to be a good practice to give all of those people my financial and many other peoples' personal information. This could be used in many ways to harm those Americans that are involved with good businesses.

One last concern is with the proposal of disclosing all litigations. I believe that this is totally off base from what it must be trying to address. In America, anyone can bring a lawsuit or complaint against anyone whether it has any truth to it or not. Many organizations already exist to handle these things for the general public. Organizations such as the Better Business Bureau and many other private organizations handle this. They should be used, as we do, for references for creditability. I am sure that many companies that are not legitimate opportunities would figure out that they could eliminate or seriously hurt the legitimate companies by making false accusations that would have to be disclosed. In that case, who would actually be harmed? It would be the Americans that need and will someday use the good, legitimate opportunities that are now out there and ready to help.

Please consider amending your proposal. Let's protect Americans, not eliminate opportunities. Thanks.

Randall L Russell